



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 6

1445 ROSS AVENUE, SUITE 1200  
DALLAS, TEXAS 75202 – 2733

Office of the Regional Administrator

December 17, 2012

Mr. Arthur Loudon  
Facility Manager  
Citgo Refining  
1801 Nueces Bay Boulevard  
Corpus Christi, Texas 78407

Dear Mr. Loudon:

The purpose of this letter is to confirm your corporation's commitment to voluntarily participate in the U.S. Environmental Protection Agency Region 6 Episodic Release Reduction Initiative. The goals and objectives below have been revised as a result of the meetings held throughout this year.

The initiative will involve the following goals and objectives:

**1. Reduce the number and quantity of releases from the adjusted baseline**

Objectives include: (1) adjust or "normalize" the number of reported releases for the past three years to determine an average for each participating facility, and (2) identify and share best management practices to reduce the number of releases for participating facilities. The workgroup industry participants will lead this effort.

**2. Participate, as appropriate, to develop and provide guidance for local officials and communities on accessing release information on state / federal websites**

Objectives include development of outreach guidance which will assist local officials and community residents on accessing information on chemical releases located on the state and federal websites (e.g., STEERS, NRC). This will also include providing information maintained by the LEPCs and how to access that information. The TCEQ has been requested to lead this effort.

**3. Participate, as appropriate, with a Regional Response Team effort to assure that the LEPC and Parish/County officials are informed of emergency plans/preparations related to major disasters**

Objectives include: (1) communication to the public concerning existing procedures and policies in place to prevent accidental releases during natural disasters (hurricanes, tropical storms), (2) dissemination of best management practices to smaller facilities regarding prevention of accidental releases during natural disasters, and (3) coordination with the LEPCs and local officials to improve communication to the public before, during, and after an incident through existing local mechanisms and programs. The EPA and the Region 6 Regional Response Team will lead this effort.

**4. Prepare and publish findings report**

Objectives include documenting participation and process. The report will be useful in determining how well this initiative was received and if the process can be useful in other circumstances.

Enclosed is a draft work plan related to the goals and objectives above. This work plan is simply to start discussions, and I expect participating facilities and states, working with the EPA, to produce a final work plan.

You may use the following draft language in the response letter if you choose to participate.

*On this \_\_\_\_\_ day of \_\_\_\_\_, 2012, \_\_\_\_\_  
hereby commits to participate in the EPA Region 6 Episodic Release Reduction Initiative.*

*\_\_\_\_\_ reserves the right to withdraw from  
participation in the initiative for any reason, in which case it will promptly notify the EPA of such  
withdrawal.*

*Participation in this voluntary program does not preclude enforcement actions for violations that have  
occurred or are being evaluated. This initiative will not affect violations that are part of a pending  
enforcement action.*

*Participation in this voluntary program does not relieve the participant of the duty to comply with all  
applicable laws and regulations.*


\_\_\_\_\_  
*Authorized Representative*

To confirm participation, please return the signed letter within 15 days to:

Mr. Steve Mason  
U.S. EPA Region 6 (6SF-PE)  
1445 Ross Avenue  
Dallas, TX 75202

Thank you in advance for your consideration and participation in this very important initiative.

Sincerely,

  
Digitally signed by Sam Coleman  
DN: cn=Sam Coleman, o=EPA Region  
6, ou=Deputy Regional Administrator,  
email=coleman.sam@epa.gov, c=US  
Date: 2012.12.17 16:54:56 -0600  
Samuel Coleman, P.E.  
Deputy Regional Administrator

Enclosure